

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
<b>Caption in Compliance with D.N.J. LBR 9004-1</b>	
839554 PHELAN HALLINAN DIAMOND & JONES, PC 1617 JFK Boulevard, Suite 1400 Philadelphia, PA 19103 856-813-5500 Attorneys for QUICKEN LOANS, LLC FORMERLY KNOWN AS (FKA) QUICKEN LOANS INC.	
In Re:	
DANIEL J. COSTELLO, JR A/K/A DANIEL JOSEPH COSTELLO	
Debtor	

Case No.: 1:19-30914 - JNP

Chapter: 13

Judge: JERROLD N. POSLUSNY JR.

### NOTICE OF MORTGAGE FORBEARANCE

The undersigned is the Attorney for Creditor QUICKEN LOANS, LLC FORMERLY KNOWN AS (FKA) QUICKEN LOANS INC. in this matter. On or about September 1, 2020, our office was advised that the mortgage loan ending in 8821 (“subject mortgage loan”), secured by real property described as 124 LINCOLN LANE, BERLIN, NJ 08009-1176, continues to be impacted by COVID-19. Pursuant to State and/or Federal guidelines a forbearance extension was offered, the terms of which are as follows:

1. The parties agree to a second forbearance period of three (3) months and Debtor has elected to not tender mortgage payments to Creditor that would come due on the subject mortgage loan starting September 1, 2020 through November 30, 2020.
2. Debtor will resume mortgage payments beginning December 1, 2020 (12/01/2020) and will be required to cure the delinquency created by the forbearance period (“forbearance arrears”).
3. The payment amount currently is \$2,289.11.
4. The Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period or any payments that were due and owing prior to the forbearance period. Creditor does not waive its rights under the terms of the note and mortgage or

under other applicable non-bankruptcy laws and regulations, including, but not limited to, RESPA, and the right to collect on any post-petition escrow shortage.

5. The Creditor does not waive its rights to seek relief from the automatic stay for reasons other than non-payment of the mortgage, including, but not limited to, a lapse in insurance coverage or payment of property taxes.

6. The Debtor does not waive any rights upon expiration of the forbearance period. Prior to the expiration of the forbearance period, the Debtor must take the following affirmative steps to address the status of the subject mortgage loan including, but not limited to: (a) bringing the account post-petition current; (b) requesting extension of the forbearance period; (c) applying for loss mitigation; and/or (d) amending the Chapter 13 Plan.

7. Any objection to this Notice must be filed and served not later than 14 days after the filing of the Notice. The Court may conduct a hearing on the objection.

**This Notice is intended to disclose a temporary forbearance of the Debtor's obligation to remit post-petition payments for the forbearance period. Nothing within this Notice should be construed to alter any rights, duties, or deadlines that are not related to the remittance of post-petition mortgage payments.**

Dated: October 7, 2020

/s/ Sherri J. Smith  
Sherri J. Smith, Esq.  
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*new. 05/2020*

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### **CERTIFICATION OF SERVICE**

DANIEL J. COSTELLO, JR  
124 LINCOLN LANE  
BERLIN, NJ 08009-1176  
VIA REGULAR MAIL  
(Debtor)

ERIC CLAYMAN, Esquire  
412 WHITE HORSE PIKE  
AUDUBON, NJ 08106  
(Attorney for Debtors)

Isabel C. Balboa, Trustee  
Cherry Tree Corporate Center, 535 Route 38 -  
Suite 580  
Cherry Hill, NJ 08002  
(Chapter 13 Trustee)

U.S. Trustee  
US Dept of Justice  
Office of the US Trustee  
One Newark Center Ste 2100  
Newark, NJ 07102

I, Jason Seidman, Legal Assistant for the law firm of Phelan Hallinan Diamond & Jones, PC, hereby certify that on October 7, 2020, I did serve a copy of the proposed to each of the above captioned parties by e-filing and regular mail.

/s/ Jason Seidman